

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S BRIEF IN SUPPORT OF  
MOTION TO FILE DOCUMENTS UNDER SEAL**

Ms. Kebe has moved this Honorable Court, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties’ Consent Protective Order (Dkt. 53), and Section II.J. to Appendix H of this Court’s Local Rules, for an Order permitting her to file certain documents under seal. Ms. Kebe submits the foregoing Brief in support of her motion.

This Court is permitted, for good cause, to shield the disclosure of confidential information from the public record. *See* Fed. R. Civ. P. 26(c). “The federal district courts derive their authority to seal or otherwise deny public access to documents or proceedings from Rule 26(c) of the Federal Rules of Civil Procedure.” *In re Estate of Martin Luther King, Jr., Inc. v. CBS, Inc.*, 184 F. Supp. 2d 1353, 1362 (N.D. Ga. 2002).

The parties have a Consent Protective Order in this case providing for the filing of documents under seal. (*See* Dkt. 53). The documents listed below contain information designated by Plaintiff as “Confidential.” The documents listed below are either documents designated by Plaintiff as “Confidential” pursuant to the parties’ Consent Protective Order or Documents designated by Ms. Kebe as “Confidential” because they contain references to, or excerpts from, documents Plaintiff has designated “Confidential”. As Plaintiff has designated the information as “Confidential,” it is Plaintiff’s burden to establish good cause for sealing. *See* Section II.J.2.e. to Appendix H of this Court’s Local Rules.

Ms. Kebe respectfully requests permission to file the following documents under seal for the reasons set forth below:

1. Defendant Kebe’s Brief Opposing Plaintiff’s Motion to Compel (hereinafter referred to as “Kebe’s Opposition Brief”) because it quotes directly from, or references, documents that have been designated as “Confidential” because Plaintiff’s Brief in Support of her Motion to Compel has already been sealed by this Court;
2. Declaration of Sadeer Sabbak (hereinafter referred to as “Sabbak Declaration”) because it quotes directly from, or references, documents that have been designated as “Confidential”;

3. Exhibit 1: excerpts from the 11/19/20 Deposition of Latasha Kebe because it contains Confidential information, and the whole transcript of this deposition has already been sealed by this Court;
4. Exhibit 2 : excerpts from the 11/30/20 Deposition of Latasha Kebe because it contains Confidential information, and the whole transcript of this deposition has already been sealed by this Court; and
5. Exhibit 3: excerpts from the 11/29/20 Deposition of Cheick Kebe because it contains confidential information, and the whole transcript of this deposition has already been sealed by this Court.

For the foregoing reasons, Ms. Kebe respectfully requests that this Court grant her motion to file documents listed above under seal.

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**CERTIFICATION AS TO FONT**

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 26th day of January, 2021.

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